

January 3, 2024

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: MR  
Deputy

**UNITED STATES OF AMERICA**

**Plaintiff**

v

**(1) HECTOR DELGADO-ESCAMILLA  
(2) ANTONIO CORTEZ-CHAVES  
(3) JORGE SALVATORI ESCOBAR-BARRAGAN**

**Defendants**

**Case No: SA:24-CR-00005-XR**

**INDICTMENT**

**COUNT 1: 18 U.S.C. § 932 Conspiracy to Straw Purchase Firearms**

**COUNT 2: 18 U.S.C. § 922(a)(6) False Statements Made in Connection with the Acquisition of Firearms**

*Notice of Government's Demand for Forfeiture*

**THE GRAND JURY CHARGES:**

**COUNT ONE  
[18 U.S.C. §§ 932(b)(2) & (c)(2)]**

On or about December 5, 2023, in the Western District of Texas, Defendants,

**(1) HECTOR DELGADO-ESCAMILLA,  
(2) ANTONIO CORTEZ-CHAVES,  
(3) JORGE SALVATORI ESCOBAR-BARRAGAN,**

and others, did knowingly conspire to purchase at least one firearm, to wit: a FN Browning model M249S, bearing serial number M249SA08065, in or otherwise affecting interstate and foreign commerce for, on behalf of, and at the request and demand of another person, knowing or having reasonable cause to believe that that other person intended to use, carry, possess, sell and otherwise dispose of the firearm in furtherance of a felony, to wit: violations of Title 18, United States Code, Sections 371 and 554, Conspiracy to Commit Smuggling of Goods, all in violation of Title 18, United States Code, Sections 932(b)(2) and (c)(2).

**COUNT TWO**  
[18 U.S.C. §§ 922(a)(6) & 924(a)(2)]

On or about December 5, 2023, in the Western District of Texas, Defendant,

**(1) HECTOR DELGADO-ESCAMILLA**

in connection with the acquisition and attempted acquisition of a firearm, to wit: a FN Browning model M249S, bearing serial number M249SA08065, from Adelbridge & Co. Firearms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious oral and written statement to Adelbridge & Co. Firearms, which statement was intended and likely to deceive Adelbridge & Co. Firearms, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that he was the actual transferee/buyer of the firearm listed on an ATF Form 4473, dated December 5, 2023, when in fact as he then knew, he was not the actual transferee/buyer of the firearm, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**  
[See Fed. R. Crim. P. 32.2]

I.

**Firearm Violations and Forfeiture Statutes**

**[Title 18 U.S.C. § 932(b)(2) and (c)(2) subject to forfeiture pursuant to  
Title 18 U.S.C. § 934(a)(1)(A) and (B)]**

As a result of the criminal violations set forth on Count One, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

**Title 18 U.S.C. § 934. Forfeiture and Fines.**  
**(a) Forfeiture. --**

**(1) In general.** -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

- (A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and
- (B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

**II.**

**Firearm Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 922(a)(6), 924(a)(2), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violations set forth on Count Two, the United States of America gives notice to Defendant HECTOR DELGADO-ESCAMILLA of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

**Title 18 U.S.C. § 924. Penalties**

**(d)(1)** Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (o) . . . of section 922 . . . or 933 . . . or knowing violation of section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes but is not limited to the following property:

1. FN Browning model M249S, bearing serial number M249SA08065; and
2. Any and all property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and
3. Any and all other property and/or accessories involved in or used in the commission of the criminal offense.

A TRUE BILL,

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA  
UNITED STATES ATTORNEY

BY:

  
FOR SADE BOGART  
Assistant United States Attorney